

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: THOMAS JAMES EDWARD SOUL	:	CHAPTER 13
Debtor(s)	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
THOMAS JAMES EDWARD SOUL	:	
Respondent(s)	:	CASE NO. 1-19-bk-03353

TRUSTEE’S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 24th day of August, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:
 - a. Plan ambiguous – Payment. Plan is identical to the First Amended Plan in that it is funded through sale of real estate for which lien creditor has stay relief and obtained title on August 5, 2019.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-609

BY: /s/James K. Jones
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 24th day of August, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Thomas James Edward Soul
92B Cemetery Avenue
Stewartstown, PA 17363

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee